

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

OMEGA THERAPEUTICS, INC., *et al.*,

Debtor.

Chapter 11

Case No. 25-10211 (BLS)

**Re: D.I. 3, 4, 5, 6, 8, 9, 10 & 16**

**Hearing Date:**

**March 12, 2025, at 1:30 p.m. (ET)**

**Objection Deadline:**

**March 5, 2025, at 4:00 p.m. (ET)<sup>1</sup>**

**NOTICE OF FIRST DAY MOTIONS AND FINAL HEARING THEREON**

**PLEASE TAKE NOTICE** that on February 10, 2025, the debtor and debtor in possession in the above-captioned chapter 11 case (the “Debtor”) filed, among others, the following motions with the Court (collectively, the “First Day Motions”).

<b>D.I. No.</b>	<b>First Day Motions</b>	<b>Interim Order D.I. No.</b>
<a href="#"><u>3</u></a>	<i>Debtor’s Motion for Entry of Interim and Final Orders (I) Authorizing Debtor to (A) Continue Its Existing Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Its Bank Accounts and Existing Business Forms, and (D) Implement Changes to the Existing Cash Management System as Necessary, (II) Extending the Time to Comply with the Requirements of 11 U.S.C. § 345(b) and the U.S. Trustee’s Operating Guidelines, and (III) Granting Related Relief</i>	<a href="#"><u>36</u></a>
<a href="#"><u>4</u></a>	<i>Debtor’s Motion for Entry of Interim and Final Orders (I) Prohibiting Utility Providers from Altering, Refusing or Discontinuing Utility Services, (II) Approving Proposed Adequate Assurance of Payment to Utility Providers and Authorizing Debtor to Provide Additional Assurance, (III) Establishing Procedures to Resolved Requests for Additional Assurance and (IV) Granting Related Relief</i>	<a href="#"><u>37</u></a>

<sup>1</sup> Any responses or objections to final approval of the relief requested in the *Debtor’s Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Adequate Protection to the Prepetition Lender, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief* are due on or before March 5, 2025, at **5:00 p.m. (ET)**.

<a href="#"><u>5</u></a>	<i>Motion of Debtor for Entry of Interim and Final Orders Establishing Notification and Hearing Procedures for, and Approving Restrictions on, Certain Transfers of, and Declarations of Worthlessness with Respect to, Interests in the Debtor's Estate</i>	<a href="#"><u>38</u></a>
<a href="#"><u>6</u></a>	<i>Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to Pay Certain Prepetition Taxes and Fees, and (III) Granting Related Relief</i>	<a href="#"><u>39</u></a>
<a href="#"><u>8</u></a>	<i>Debtor's Motion for Interim and Final Orders (I) Authorizing Payment of Prepetition Claims of Certain Critical Vendors and (II) Granting Related Relief</i>	<a href="#"><u>40</u></a>
<a href="#"><u>9</u></a>	<i>Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing Debtor to (A) Pay Certain Prepetition Employment Obligations and (B) Maintain Employee Benefits Programs and (II) Granting Related Relief</i>	<a href="#"><u>41</u></a>
<a href="#"><u>10</u></a>	<i>Motion of Debtor for Interim and Final Orders (I) Authorizing Debtor to Continue Its Insurance Program and Pay All Obligations with Respect Thereto, (II) Honor Certain Prepetition Obligations Related to the Foregoing, (III) Renew, Revise, Extend, Supplement, Change or Enter into New Insurance Coverage as Needed in its Business Judgment, and (IV) Granting Related Relief</i>	<a href="#"><u>42</u></a>
<a href="#"><u>16</u></a>	<i>Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Adequate Protection to the Prepetition Lender, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief</i>	<a href="#"><u>44</u></a>

**PLEASE TAKE FURTHER NOTICE** that the First Day Motions were heard at a hearing on February 11, 2025 (the "First Day Hearing"), at which time the court approved the First Day Motions identified above on an interim basis.

**PLEASE TAKE FURTHER NOTICE** that any responses or objections to final approval of the relief requested in the First Day Motions must (a) be in writing; (b) be filed with the Clerk of the Bankruptcy Court, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before **March 5, 2025, at 4:00 p.m. (ET)**<sup>2</sup> (the "Objection Deadline"); and (c) served so as to be received on or before the Objection Deadline by the undersigned counsel to the Debtor.

**PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER FINAL APPROVAL OF THE FIRST DAY MOTIONS WILL BE HELD ON MARCH 12, 2025, AT 1:30 P.M. (ET) BEFORE THE HONORABLE BRENDAN LINEHAN SHANNON AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824**

<sup>2</sup> Any responses or objections to final approval of the relief requested in the *Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Adequate Protection to the Prepetition Lender, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief* are due on or before March 5, 2025, at **5:00 p.m. (ET)**.

**MARKET STREET, 6TH FLOOR, COURTROOM #1, WILMINGTON, DELAWARE 19801.**

**PLEASE TAKE FURTHER NOTICE THAT ONLY OBJECTIONS MADE IN WRITING AND TIMELY FILED AND RECEIVED IN ACCORDANCE WITH THE PROCEDURES ABOVE WILL BE CONSIDERED BY THE BANKRUPTCY COURT AT SUCH HEARING.**

**IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF IN THE FIRST DAY MOTIONS ON A FINAL BASIS WITHOUT FURTHER NOTICE OR HEARING.**

Copies of the First Day Motions are available free of charge at <https://cases.ra.kroll.com/omega/>. Copies of the First Day Motions may also be inspected in the offices of the Clerk of the Bankruptcy Court during normal business hours or downloaded from the Bankruptcy Court's website at [www.deb.uscourts.gov](http://www.deb.uscourts.gov). Please note that prior registration with the PACER Service Center and payment of a fee may be required to access such documents. Parties in interest may sign up for a PACER account by visiting the PACER website at <http://pacer.psc.uscourts.gov> or by calling (800) 676-6856.

Dated: February 12, 2025  
Wilmington, Delaware

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*Proposed Counsel to the Debtor and Debtor in Possession*